

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Larry Broadnax Jr.

Case: 2:22-mj-30324

Case No. Assigned To : Unassigned

Assign. Date : 7/29/2022

Description: COMPLAINT USA v.
BROADNAX (SO)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 27, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. §§ 922(k) and 924(c)

Possession of a firearm with an obliterated serial number and
possession of a firearm in furtherance of a drug trafficking crime.

21 U.S.C. § 841(a)

Possession of cocaine.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 29, 2022City and state: Detroit, MI


Complainant's signature

Jeb Rutledge, Task Force Officer, ATF

Printed name and title



Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Task Force Officer Jeb Rutledge, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a duly sworn Police Officer currently holding the rank of Detective with the City of Detroit, MI. I have been with the Detroit Police Department since 1998 and appointed to Detective in 2014. In my 22 years as a Detroit Police Officer, I have worked numerous assignments including: Uniformed Patrol, plainclothes Precinct Special Operations, Breaking and Entering Task Force, Precinct Detective Unit, Homicide and my current assignment, the Bureau of Alcohol, Tobacco, Firearms and Explosives/Detroit Police Firearms Investigative Team (ATF/FIT). During my career, I have been involved in or have been the Officer in Charge of hundreds of investigations. I transferred to the ATF/FIT in August 2020 and was sworn in as a Task Force Officer in November 2020. I have participated in numerous investigations in which narcotics, dangerous drugs, and the proceeds, records and books of such illegal activities, and firearms were seized.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, review of evidence, communications with others who have

personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. ATF is currently conducting a criminal investigation concerning Larry BROADNAX Jr. (DOB: XX/XX/1980). Probable cause exists that BROADNAX, possessed a firearm with an obliterated serial number, was in possession of crack cocaine, and was in possession of a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. §§ 922(k) and 924(c) and 21 U.S.C. § 841(a).

II. PROBABLE CAUSE

4. On July 27, 2022, at approximately 10:34 pm, three Detroit Police officers in full uniform and in a semi-marked scout vehicle were on patrol near Jefferson Avenue and Griswold Street in downtown Detroit, Michigan. While on patrol, the officers pulled over a 2022 Mitsubishi Outlander with illegally tinted windows. As the officers approached the vehicle, they gave commands to the driver and sole occupant—Larry BROADNAX Jr.—to roll down all of the vehicle’s windows. After multiple requests by the officers, BROADNAX eventually complied and rolled down the vehicle’s windows.

5. One officer stood on the driver’s side of BROADNAX’s vehicle and two officers stood on the passenger’s side. Within the first two minutes of the traffic stop, BROADNAX opened his center console to look for his vehicle’s registration paperwork. While BROADNAX had the center console open, the officers standing on

the passenger's side of the vehicle observed suspected crack cocaine in clear plastic bags sitting inside the console. The officers asked BROADNAX to step out of the vehicle and placed him in handcuffs. The officers then immediately recovered two plastic bags containing crack cocaine from the center console of the vehicle.

6. Officers continued to search the vehicle and recovered two cell phones, \$4,362 in United States currency, and a handgun. The handgun—a S&W 9mm M&P with an obliterated serial number—was recovered from inside the glove compartment. BROADNAX had a third cellphone and \$390 in United States currency in his pockets.

7. Officers did a True Narc test on the controlled substances recovered from the center console of BROADNAX's vehicle. The controlled substance weighed 43.5 gross grams and tested positive as cocaine.

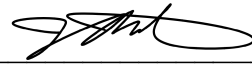
8. On July 29, 2022, Special Agent Nathan Triezenberg advised Affiant, based upon the verbal descriptions provided, without physically examining the firearm, that the referenced firearm is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the state of Michigan after 1989, and therefore had traveled in and affected interstate commerce.

III. CONCLUSION

9. Probable cause exists that Larry BROADNAX Jr., did knowingly and intentionally possess a firearm with an obliterated serial number, said firearm having affected interstate commerce, in violation of 18 U.S.C. § 922(k).

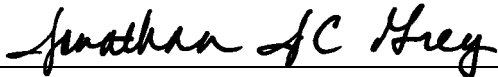
10. Probable cause exists that BROADNAX possessed the 43.5 gross grams of cocaine in violation of 21 U.S.C. § 841(a). Further, the combination of the firearm and the cocaine, attributable to BROADNAX, established probable cause that BROADNAX possessed a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c).

Respectfully submitted,



Jeb Rutledge, Task Force Officer
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. JONATHAN J.C. GREY
UNITED STATES MAGISTRATE JUDGE

Dated: July 29, 2022